



B. Kreyit
COPY

Reply to
Attn of: AT-083

MAY 31 1991

Dr. Deborah Hankins
Manager, Remedial Projects
General Electric Company
275 Battery St. 23rd Floor
San Francisco, CA 94111

RECEIVED

JUN 3 '91

EPA-WOO

RE: General Electric site in Spokane, WA
EPA ID# WAD135852150

Dear Ms. Hankins:

This letter concerns the disposal process being used to demonstrate Geosafe Corporation's alternate thermal disposal method [In Situ Vittrification (ISV)] for polychlorinated biphenyls (PCBs). The demonstration test burn was to take place at a Superfund remedial site owned by General Electric Company located at East 4323 Mission Avenue, Spokane, WA. The test was to be performed in accordance with the approval issued on August 2, 1990, by the US Environmental Protection Agency (EPA). This demonstration test burn approval was effective from October 15, 1990 through December 1, 1990.

I understand that on May 21, 1991, you spoke to Christina Colt of my staff and discussed the potential problems in being able to obtain a "certificate of disposal" for PCBs brought to the site as required by the approval. It appears that approximately 1,000 pounds of liquid PCBs were brought to the site in October 1990 for a test run using soil spiked to a concentration of 10,000 ppm PCB. The soil was spiked in November and was placed in a treatment trench for the demonstration of "Melt #2. The trench is lined with one foot of cobble and one foot of clean soil, and has a one foot cap of clean soil. General Electric estimates that to remove and incinerate the PCB-contaminated soil in the one trench for Melt #2 would cost approximately \$2.7 million dollars. According to your facsimile dated 5/23/91, the cost estimate is \$13,492,000 if the project is not completed and all of the waste is removed and incinerated. You mention that, because of unforeseen circumstances, the project will be delayed until at least November 1991 which will cause you to exceed the one year limit for disposal of the PCBs transported to this site from off-site.

As stated in 40 CFR § 761.65(a), PCBs must be removed from storage and disposed of as required by 40 CFR Part 761 Subpart D within one year from the date they were first placed into storage. EPA does not have the authority to waive this requirement. The knowing violation of this regulation can result in both civil and criminal liability. Also, at this point in time, Geosafe does not have a current approval to allow an alternate means of disposal. Without a current approval for an alternate thermal disposal method, incineration is the only means allowed for disposal; and storage of the PCBs in the meantime must comply with 40 CFR § 761.65(b).

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If you have any questions regarding this matter, please contact
Christina Colt, EPA Region 10 PCB Disposal Coordinator, at (206) 553-8577.

Sincerely,



Kenneth D. Feigner, Chief
Pesticides and Toxic Substances Branch

cc: Hiroshi Dodahara, EPA HQ/TS-798
Bob Kievit, EPA/PV-11
Peter Maule, WA DOE
Guy Gregory, WA DOE